

Before the Federal
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
) WT Docket No. 10-153
Notice of Proposed Rule Making and Notice of)
of Inquiry, Regarding the Amendment of Part 101) WT Docket No. 09-106
of the Commission's Rules to Facilitate the Use of)
Microwave for Wireless Backhaul and Other Uses.) WT Docket No. 07-121

COMMENTS OF SIERRA TELECOM INC.

Sierra Telecom Inc. (Sierra) advises businesses on how to achieve significant profitable growth by capitalizing on innovative technology and regulatory change.

Last year the National Broadband Plan stated: "Broadband is a platform to create today's high-performance America—an America of universal opportunity and unceasing innovation, an America that can continue to lead the global economy, an America with world-leading, broadband-enabled health care, education, energy, job training, civic engagement, government performance and public safety." With this NPRM the Commission takes the first step in achieving the goals of the NBP.

Spectrum Sharing and the "Final Link" Rule

As technology continues to advance, it will make it more and more possible for spectrum sharing to be used as a way to maximize the efficient use of spectrum. Therefore, Sierra supports changes to the rules in frequency bands where a transition can be made to multiple usages while protecting the incumbent licensees during the transition phase.

Adaptive Modulation

Adaptive modulation is used in Part 15 frequency bands to maximize the amount of data that can be transferred over a link (the "payload"). Therefore, Sierra fully supports a clarification of Section 101.114 of the Rules to allow for the benefits of adaptive modulation in Part 101 frequency bands. As adaptive modulation is dynamic and continuously optimizes the rate of data transfer (payload) over the link, the best way to ensure the highest payload efficiency would be to add wording

to Section 101.114(a)(3) to mandate that all FS microwave paths must use equipment with "Adaptive Modulation."

Auxiliary Fixed Stations

Through its proposed Rule Making the Commission will make it possible for innovative new products to put to productive use coordinated spectrum that has, until now, remained fallow and bring the benefits of high quality, low cost broadband to underserved urban and underserved and un-served rural communities, while protecting existing licensees and future applicants.

Modification of Efficiency Standards in Rural Areas and Review of Antenna Standards

Sierra believes lowering efficiency standards would be the antithesis of promoting innovation as a way to solve market needs, especially as there is an increasingly compelling need to increase efficiency standards.

Sierra looks forward to putting innovative new technologies to product use.

Respectfully submitted,

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